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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

Modell's Sporting Goods, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 20-14179 (VFP)

(Jointly Administered)

**JOINDER TO LIMITED OBJECTIONS OF LANDLORDS TO DEBTORS' REQUEST
FOR FURTHER SUSPENSION OF CHAPTER 11 CASE**

Kimco Realty Corporation and certain of its affiliates (collectively, "Kimco"), by its attorneys, Morgan, Lewis & Bockius, LLP, in response to Debtors' *Notice of Intent to Seek a Further Suspension of their Chapter 11 Cases Through and Including May 31, 2020* [Dkt. No. 234] (the "Notice") respectfully states as follows:

1. Kimco is landlord to the Debtors pursuant to certain leases for non-residential real property (the "Kimco Leases").²
2. For the reasons stated therein, Kimco hereby joins in the Limited Objections filed by various landlord entities.

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor's federal tax identification number, as applicable, are as follows: Modell's Sporting Goods, Inc. (9418); Modell's II, Inc. (9422); Modell's NY II, Inc. (9434); Modell's NJ II, Inc. (9438); Modell's PA II, Inc. (9426); Modell's Maryland II, Inc. (9437); Modell's VA II, Inc. (9428); Modell's DE II, Inc. (9423); Modell's DC II, Inc. (9417); Modell's CT II, Inc. (7556); MSG Licensing, Inc. (8971); Modell's NH, Inc. (4219); Modell's Massachusetts, Inc. (6965) and Modell's Online, Inc. (2893). The Debtors' corporate headquarters is located at 498 Seventh Avenue, 20th Floor, New York, New York 10018.

² The Kimco Leases and related documentation are voluminous, and therefore, have not been attached to this Joinder. Kimco will provide copies of the Kimco Leases and related documentation to this Court and parties in interest upon request.
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3. To the extent not inconsistent this objection, Kimco hereby joins in all objections raised by any other landlords and incorporates all of the arguments raised by the other objecting landlords as if set forth in detail herein.

4. Kimco reserves the right to supplement this Joinder and make such other and further objections as may be necessary or appropriate as may be necessary, whether at or prior to the hearing on the Notice, including to any proposed form of order.

WHEREFORE, Kimco respectfully requests that the Court deny the Debtors' request for an extension of the Suspension Period to the extent it seeks a further deferment of the time for performance of their obligations under their leases and grant such other and further relief as the Court deems just and proper.

Dated: April 24, 2020

MORGAN, LEWIS & BOCKIUS LLP
Attorneys for Kimco Realty Corporation

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CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of April, 2020, a true and correct copy of the foregoing document was sent via ECF Noticing to all parties receiving ECF Notices in these chapter 11 cases.

/s/ Glenn E. Siegel
Glenn E. Siegel